

1
2
3
4
5
6 **MAGISTRATE JUDGE J. KELLEY ARNOLD**

7
8 **UNITED STATES DISTRICT COURT**
9 **FOR THE WESTERN DISTRICT OF WASHINGTON**
10 **AT TACOMA**

11 LARRY A. AMARAL, a single person,

12 Plaintiff,

13 vs.

14 CASEY SALISBURY, Sheriff, Mason
15 County, "JOHN DOE," Unknown Deputy
16 Sheriff, Mason County, and MASON
17 COUNTY,

18 Defendants.

NO. C08-5615JKA

**STIPULATION AND
PRODUCTION/PROTECTIVE
ORDER RE SHERIFF'S OFFICE
RECORDS OF WITNESSES**

19 **STIPULATION**

20 The parties, through their respective counsel, hereby stipulate and agree that
21 plaintiff has propounded a discovery request to the defendants in the above-entitled
22 action seeking production of all reports, materials and information in the possession of
23 the Mason County Sheriff's Office that relate to contacts between the Sheriff's Office
24 and any witnesses involved in incidents leading to plaintiff's arrest by Sheriff's Office
25 personnel; that records responsive to this request have been identified and serially
26 numbered MCSO 00400-00599; that these records include information and
documentation which may constitute criminal history record information deemed
confidential under Ch. 10.97 RCW and/or RCW 70.48.100; and that these records

STIPULATION AND PRODUCTION/PROTECTIVE
ORDER RE SHERIFF'S OFFICE RECORDS OF
WITNESSES - 1

Cause No: C08-5615 JKA

*LAW, LYMAN, DANIEL,
KAMERRER & BOGDANOVICH, P.S.
ATTORNEYS AT LAW
2674 RW JOHNSON BLVD SW, TUMWATER, WA 98512
PO BOX 11880, OLYMPIA, WA 98508-1880
(360) 754-3480 FAX: (360) 357-3511*

1 should be produced by defendants in response to the afore-mentioned discovery
2 request, but with protections and limitations on dissemination and use whereby these
3 records may only be used in connection with, and for purposes of, the above-entitled
4 action, and whereby upon termination of this lawsuit by finality of judgment or
5 dismissal all copies of these records provided to plaintiff and any additional copies
6 made by plaintiff for use in this suit shall be returned to counsel for defendants or
7 destroyed, in which case sworn verification of destruction shall be provided.

8
9 _____
10 Date

Guy Bogdanovich, WSBA N° 14777
Attorney for Defendants

11
12 _____
13 Date

Wm. Michael Hanbey, WSBA N° 7829
Attorney for Plaintiff

14
15 **PRODUCTION/PROTECTIVE ORDER**

16 THIS MATTER having come before the Court on the parties' stipulation for a
17 production/protective order covering certain materials to be produced in discovery, it is
18 hereby

19 ORDERED, ADJUDGED and DECREED that the parties' stipulation set forth
20 above, is adopted by the Court as its production/protective order.

21 DATED this 6th day of April, 2009.

22
23 /s/ J. KelleyArnold
24 J. Kelley Arnold
25 United States Magistrate Judge
26

STIPULATION AND PRODUCTION/PROTECTIVE
ORDER RE SHERIFF'S OFFICE RECORDS OF
WITNESSES - 2

Cause No: C08-5615 JKA

*LAW, LYMAN, DANIEL,
KAMERRER & BOGDANOVICH, P.S.*
ATTORNEYS AT LAW
2674 RW JOHNSON BLVD SW, TUMWATER, WA 98512
PO BOX 11880, OLYMPIA, WA 98508-1880
(360) 754-3480 FAX: (360) 357-3511

1 Presented by:

2 LAW, LYMAN, DANIEL,
3 KAMERRER & BOGDANOVICH, P.S.

4 _____
5 Guy Bogdanovich, WSBA N° 14777
6 Attorney for Defendants

7 Approved for entry:

8 _____
9 Wm. Michael Hanbey, WSBA N° 7829
10 Attorney for Plaintiff

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

STIPULATION AND PRODUCTION/PROTECTIVE
ORDER RE SHERIFF'S OFFICE RECORDS OF
WITNESSES - 3

Cause No: C08-5615 JKA

*LAW, LYMAN, DANIEL,
KAMERRER & BOGDANOVICH, P.S.*
ATTORNEYS AT LAW
2674 RW JOHNSON BLVD SW, TUMWATER, WA 98512
PO BOX 11880, OLYMPIA, WA 98508-1880
(360) 754-3480 FAX: (360) 357-3511